

### III. REMARKS

1. Claims 1-23 remain in the application. Claims 1, 11, 16 have been amended.

2. Applicants respectfully submit that claims 1, 2, 11, 12, 16, and 19 are not anticipated by Goñi et al. (US 5,991,164, "Goñi") under 35 USC 102(e).

Goñi fails to disclose or suggest utilizing the access point as a network element participating directly or indirectly in offering a wireless connection to a terminal, as recited by claim 1.

Goñi also fails to disclose or suggest the other features of claim 1, including storing data on an IC card for connecting at least one access point to a functional connection with the fixed network part, connecting the IC card inserted in the access point in response to a need to connect the access point to the fixed network part, and connecting necessary resources of the fixed network part to a functional connection with the access point on the basis of said stored data.

Goñi discloses a solution for using a standard analog terminal (a POTS phone) via a cellular radio system. As shown in Figure 1, the analog phone (110) may be interfaced (by LIP 120) with a cellular radio terminal (RCP), such as a GSM mobile station, connected to a cellular radio network. Analog signals of the analog phone may be converted into a signal format applied in the cellular radio system, and vice versa.

The fixed cellular terminal (FCT; formed by the LIP and the RCP and used as the intermediate device for the analog phone) of Goñi is a terminal device and cannot be interpreted as being a network element participating in offering a wireless connection to a terminal. The FCT provides access for the analog phone, but the analog phone is not provided with wireless access, and the FCT in general cannot be considered as a network element. Therefore, the functions performed in the cellular terminal of Goñi do not anticipate any of the features of the network element as currently claimed. Network elements suitable for providing access directly or indirectly for the terminal (i.e. for the RCP of the FCT) are described in Goñi in Figure 1 (the base station controller 150 and the radio base station 140) and col. 6, l. 35-38, but there is no indication on how to arrange connecting of such network element to the fixed network part, i.e. the core network (the mobile switching center 160). The access point network elements are merely connected with a single line.

Therefore, Goñi cannot provide any solution for the problem of connecting such an access point network element to a fixed network part, for instance when the access point network element is a movable base station temporarily transferred to an event area for providing additional wireless connections.

Further, Goñi fails to disclose or suggest anything related to including an IC card in an access point network element, connecting such IC card inserted in the access point network element, or further applying the information in the IC card for connecting the access point network element to fixed network

part. Goñi is limited to applying an IC card in the radio terminal (RCP) of the fixed cellular terminal FCT.

Goñi especially fails to disclose the feature of connecting necessary resources of the fixed network part to a functional connection with an access point on the basis of data stored on the IC card. Even if Goñi were to disclose that the information on a SIM card in the RCP may be accessed, there is no indication of utilizing the information for connecting an access point network element to a fixed network part, or even the fixed cellular terminal to the cellular network.

Even if the information on the SIM could be used for connecting the fixed cellular terminal to the cellular network, this would not lead a person skilled in the art to the present solution for connecting the access point network element to the fixed network part. Instead, Goñi only teaches using the information on the SIM solely for checking internally in the fixed cellular device FCT (before call setup by the call setup task 217 in the LIP 125) whether the call set up is possible or not; see col. 14 lines 35-65.

Claims 11 and 16 are directed to similar subject matter. Therefore, for all the reasons above, Goñi does not anticipate independent claims 1, 11, and 16, and dependent claims 2, 12, and 19.

3. Applicants respectfully submit that claims 3-5, 8, 13, 17, and 18 are patentable over the combination of Goñi and Mills Jr. (US 6,665,529, "Mills") under 35 USC 103(a).

Claims 3-5, 8, 13, 17, and 18 depend from claims 1, 11, or 16. Mills fails to disclose or suggest the features of the independent claims missing from Goñi.

Mills fails to disclose or suggest utilizing an access point as a network element participating directly or indirectly in offering a wireless connection to a terminal, storing data on an IC card for connecting at least one access point to a functional connection with the fixed network part, and connecting the IC card in response to a need to connect the access point to the fixed network part, where the IC card is inserted in the access point, as recited by claims 1, 11, and 16.

Applicants find no disclosure in Mills related to using an access point as a network element participating directly or indirectly in offering a wireless connection to a terminal. Applicants further submit that while Mills states that the mobile station (MS 20) registers with the MSC/VLR 26 using a temporary identity or an IMSI (col. 6, lines 23-25), that this is not the equivalent of connecting an IC card that has been inserted in the access point. It simply means that the IMSI is conveyed to the MSC/VLR. There is nothing in Mills that discloses or suggests connecting an IC card that has been inserted in the access point.

In contrast, Applicants' claim describes the IC card as "onto which is stored data for connecting at least one access point to a functional connection with the fixed network part." There is nothing in Mills related to using data on the IC card for connecting an access point to a fixed network, specifically when the IC card is inserted in the access point.

The cited portions of Mills simply state that the mobile station registers using the mobile subscriber identity. Mills clearly does not state or suggest that base station will read the IMSI stored on the SIM card, only that the mobile station registers using the IMSI.

At least for these reasons, Applicants respectfully submit that the combination of Goñi and Mills does not render claims 3-5, 8, 13, 17, and 18 unpatentable.

4. Applicants respectfully submit that claims 6, 9, 10, 14, and 20 are patentable over the combination of Goñi and Widegren et al. (US 6,374,112, "Widegren") under 35 USC 103(a).

Claims 6, 9, 10, 14, and 20 depend from claims 1, 11, or 16. Widegren fails to disclose or suggest the features missing from Goñi.

Specifically, Applicants find no disclosure in Widegren related to utilizing an access point as a network element participating directly or indirectly in offering a wireless connection to a terminal, storing data on an IC card for connecting at least one access point to a functional connection with the fixed network part, connecting the IC card inserted in the access point in response to a need to connect the access point to the fixed network part, and connecting necessary resources of the fixed network part to a functional connection with the access point on the basis of the stored data.

At least for these reasons, Applicants respectfully submit that claims 6, 9, 10, 14, and 20 are patentable over the combination of Goñi and Widegren.

5. Applicants respectfully submit that claims 7, 15, 21, and 23 are patentable over the combination of Goñi, Widegren, and Mills under 35 USC 103(a).

Claims 7, 15, 21, and 23 depend from claims 1, 11, or 16. For all the reasons stated above, Applicants submit that neither Widegren nor Mills provides the features of the present independent claims lacking in Goñi.

Therefore, Applicants respectfully submit that the combination of Goñi, Widegren, and Mills fails to render claims 7, 15, 21, and 23 unpatentable.


6. Applicants respectfully submit that claim 22 is patentable over the combination of Goñi, Mills, and Widegren under 35 USC 103(a).

As argued above, the combination of Goñi, Mills, and Widegren fails to disclose or suggest all the features of claim 1 from which claim 22 depends, and therefore Applicants respectfully submit that claim 22 is patentable over the cited combination of art.

For all of the foregoing reasons, it is respectfully submitted that all of the claims now present in the application are clearly novel and patentable over the prior art of record, and are in proper form for allowance. Accordingly, favorable reconsideration and allowance is respectfully requested. Should any unresolved issues remain, the Examiner is invited to call Applicants' attorney at the telephone number indicated below.

The Commissioner is hereby authorized to charge payment for any fees associated with this communication or credit any over payment to Deposit Account No. 16-1350.

Respectfully submitted,

  
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